



A 501(c)3 Nonprofit Organization
 1336 Gladys Avenue, Long Beach, California 90804
 562-438-9000 * 562-439-0327 (fax)

info@longbeachorganic.org www.longbeachorganic.org

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 CITY OF LONG BEACH
 COMMUNITY DEVELOPMENT
 ADMINISTRATION

February 8, 2005

Angela Reynolds, Environmental Officer
 Department of Planning & Building: Sports Park DEIR
 City of Long Beach
 333 West Ocean Boulevard, 7th Floor
 Long Beach, CA 90802

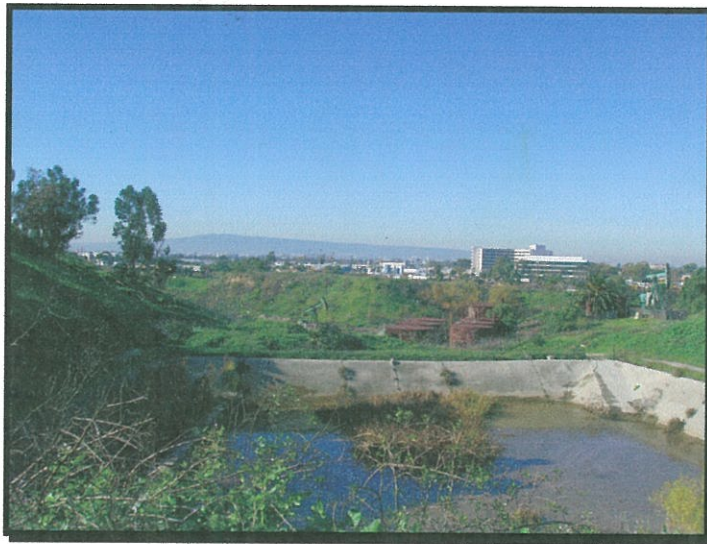
Re: **Willow Springs Sports Park EIR**

Dear Ms. Reynolds,

Thank you for the opportunity to respond to the Big League Dreams (BLD) Sports Park proposal for the 55-acre property between Willow, Spring, California, and Orange Avenues (Willow/Springs Gulch). We will state our concerns about the proposal according to the topical chapters in the Environmental Impact Report (EIR) released on December 15, 2004. 1

Chapter 7 Wetlands Mitigation

The City proposes to mitigate the loss of wetlands in the 0.42-acre retention basin and 0.08 acre surrounding rim of wetlands by creating a 0.6-acre artificial wetlands in El Dorado Park. 2



Picture #1: Willow/Springs Gulch retention basin (0.42 acre)
 with rim of surrounding "wetlands" (0.08 acre)

We object to this for the following reasons:

- The actual area of wetlands on the Willow/Springs Gulch property according to the historical maps and the current presence of wetland obligate fauna (mulefat, etc.), and standing water is nearer to 15 acres than 0.5 acres stated. 3
- Photos of Willow/Spring Gulch after the recent storms of 2005 showed several acres of standing water in the previous wetland area. Since the LSA Associates, Inc. EIR was done after a long dry period, CA Dept. of Fish and Game and the Army Corps of Engineers should be asked to revisit the site and make a new true value assessment of the area of wetlands habitat before requesting certification of the EIR. 4



Picture #2: Pooling in the original wetlands area about a week after the recent rains. Black Oak and wetland-obligate flora are in abundance.

We further object to the conclusions on wetland issues for the following reasons:

- Wetlands are much easier to restore than to create, or recreate elsewhere. 5
- Nationally, most compensatory wetlands mitigation projects have poor compliance with the permit issued by the regulatory agency and even with compliance, the majority are functional failures. 6
- The BLD Sports Park proposal is not in keeping with the goals and policies set forth in the Long Beach General Plan Open Space Element (2002) as noted on page 18: "Perhaps foremost among this locality's concerns, shared with our neighbors along the rivers and coasts, is saving what we have of our once very fertile habitats—coastal and riparian ecosystems. Wetlands, arguably the most biologically productive environments on the earth, are particularly important in our uniquely mild Mediterranean climate here in Southern California. They serve as a critical wildlife habitat, marine life nursery, and stopping/feeding grounds for migratory birds. With 90-95% of this region's wetlands lost to development, Long Beach and its neighbors that have remaining wetland acreages are in a unique position to do something to preserve and restore wetlands. This concern is at the top of our list of issues pertaining to the preservation of our natural resources." 7
- The Willow/Spring Gulch property in question is in a 100-year flood plain and as such, according to federal regulations from the US Department of the Interior Fish and Wildlife Service, must not be sold, leased, or rented to a for-profit entity for commercial purposes. 8
- Sustainable restoration of the Willow/Spring Gulch wetlands would increase our security against damaging floods. 9
- Restoring the wetlands would filter and detoxify waterborne pollutants, reducing pollution sent into the Pacific Ocean via the Los Angeles River. 10
- A restored wetland would add educational and recreational amenities to the residents, most importantly, the children of Long Beach. 11

Chapter 4 Recreation

As documented in the Long Beach Park, Recreation, and Marine Strategic Plan (2003), the greatest need for recreation is on the west, south, and north of Long Beach where the population density is high, the average income is low, and the allocation of open space for active recreation is low relative to the east side. Also according to the Dept of Parks, Recreation, and Marine Strategic Plan (2003) PG 35, Long Beach now has 42 soccer/football fields (1 for 11,000 residents) and 65 baseball/softball fields (1 for 7,000 residents). Based on national surveys with undocumented relevance to Long Beach, this strategic plan estimates that the City needs an additional 27 baseball/softball fields and 55 soccer/football fields. In addition, the Long Beach General Plan Open Space Element (2002) Pg 9 states, "If Long Beach Public Schools were more accessible, they would contribute another 359 acres of recreation open space to the City inventory." 12

Based on these City Council endorsed plans for the development of Long Beach, the premise that the Big League Dreams Sport Park proposal meets high priority recreation needs of Long Beach is unsupported for the following reasons:

- According to employees of both the Long Beach Parks and Recreation and Marine Department and the Long Beach Unified School District (LBUSD), the 359 acres of recreation open space of the LBUSD are now available to the public after school and on weekends. 13

- No survey of Long Beach baseball/softball/soccer/football players documents the need for an additional 27 baseball/softball fields and 55 soccer/football fields. | 14
- However, the need for more community gardens as active recreation for all ages is acute. | 15
- The Long Beach General Plan Open Space Element (2002) on PG 22 under "Open Space for the Managed Production of Resources Implementation Programs" states that it is a priority to "Work with non-profit groups (such as Long Beach Organic) to examine the feasibility of expanding open space for community gardens." Long Beach currently has only about 20 acres for 462,000 people. Many Asian and Hispanic Long Beach residents grew up farming in their native lands and would like opportunities to garden here. Black and Caucasian Long Beach residents are also currently underserved in this regard. Very few schools offer gardening experiences to children or have gardens. Long Beach north and west is especially lacking in available green community space for its residents. | 16

Chapter 4 Recreation—Economic justice considerations

"An operating contractor for the Sports Park facility, soccer, batting cages, skateboard area has not been selected and user fees have yet to be established. It is anticipated that fees for the sports park will be competitive with comparable public and private facilities in the greater Long Beach area it is currently anticipated that the youth sports facilities will be operated by not-for-profit or nonprofit enterprises and that fees will be established that maintain accessibility by the majority of the City's population." (EIR pg 4.10-12) | 17

- The absence of projected costs to the City and projected user fees stated in the EIR makes it impossible to compare the economic viability of this project with any alternatives. | 18
- Low-income recreation underserved Long Beach residents from high population density areas will not be able to afford to use this pay for play Sports Park if the costs are like those of the BLD Sports Park in Chino Hills. | 19
- This pay for play Sports Park is inconsistent with the Long Beach Park, Recreation, and Marine Strategic Plan's priority to first increase recreation open space in currently underserved areas of Long Beach. | 20
- Similar sports park public-private partnerships in other cities have failed, leaving the cities to pick up the tab. | 21

Chapter 4 Recreation—Youth Golf

A youth golf training facility will be included. Golf, with rare exceptions, is for rich kids. Please address the following: | 22

- The EIR is incomplete without an economic analysis of this golf range. | 23
- No needs assessment shows that we need a youth golf training facility for underserved areas of Long Beach or for the more affluent coast and east regions. | 24
- Local youth golfers can play on approximately 500 acres of existing golf courses in Long Beach. | 25
- This proposed facility couldn't be economically viable without charging amounts that only Long Beach kids from the east side and coast could afford. | 26
- The City should not subsidize the construction and ongoing operation of this facility in lieu of increasing or even maintaining the current recreation programs for underserved kids. | 27

Chapter 5 Alternatives: "The California Environmental Quality Act (CEQA) requires that the EIR consider a reasonable range of feasible alternatives to the project or to the location of the project. Factors that may be taken into account when addressing the feasibility of alternatives are the site suitability, economic viability, availability of infrastructure, general plan consistency, and other plan regulations or limitations, jurisdictional boundaries, and whether the proponent can acquire, control, or otherwise have access to the alternative site." 28

Our concerns are the following: 29

- Since economic viability is a major consideration, we need to know the initial and on-going costs of the BLD Sports Park to the City relative to other potential recreation projects—CEQA requires it. 29
- The old off-the-record estimate of \$20-25 million that the BLD Sports Park project will cost (according to Mike Conway) needs to be much better defined. 30
 1. What additional costs will the wetlands mitigation involve? 31
 2. The 6 acres of the property now privately owned need to be purchased by the City. How will this be funded? Will the current owner be responsible for cleaning up hazardous wastes on the site? Will property owned by the City be traded for this polluted site? 32
 3. The proportion of the cost of constructing the BLD Sports Park that will be contributed by the City has not yet been negotiated. This omission is unacceptable. 33
 4. The for-profit nature of the enterprise precludes grants from federal, state, and charitable foundation sources. Consequently, the City will end up paying more. 34
 5. Depending on the findings during grading, this preliminary estimate can escalate to an unknown degree. 35

We feel that the true cost of this project will exceed \$125 million USD. 36

Chapter 5 Alternatives: "The existing conditions on site are not considered biologically or archeologically unique and creating an acceptable 'natural' environment would require the investment of substantial public funds...While bond and grant funding may also be available for a cultural/nature park, no private funding is likely because no ongoing revenue would be generated." 37

- How can this or any alternatives be dismissed as economically unviable when the true BLD Sports Park costs have not been officially revealed in the EIR or elsewhere? 38
- Grants from government agencies or nonprofit foundations would be harder to obtain if not unavailable because BLD is a for-profit company. 39
- The determination of the best use of this property should involve an informed collaboration of stakeholders throughout the City. However, as an example, consider the economic viability of a multi-use plan for the property including 40
 1. Community Gardening (grants are available and gardeners pay plot fees)
 2. A composting facility that charges tipping fees for receiving green waste (CH2MHill is interested in this site for a commercial composting facility. This would help Long Beach meet future solid waste diversion state-mandated goals.)
 3. An organic nursery and nursery/landscape training center for Long Beach youth (grants are available)
 4. A 12-20 acre wetlands restoration project (Wetlands Recovery Project funds are available) 41
 5. 13 flat acres for sports fields, a skate park, picnic areas (the \$5 million of remaining County bond funds earmarked for a sports park could pay this without using other revenue sources)
 6. Hiking trails with signage about the Ahwaanga/Gabrielino/Tongva Indians, the spring providing the original water source for early Long Beach residents, and the significance of the wetland restoration

Funding the BLD Sports Park

The funding sources mentioned in the EIR do not include the Long Beach general fund or borrowing. However, the Long Beach Parks, Recreation, and Marine Strategic Plan (2003) mentions funding a sports park with general fund money and borrowing. 42

- Does the City plan to float a bond for this BLD Sports Park preparation? 43
- Will the proposed \$200 million capitol improvement bond include this project? 44

Three year Long Beach Financial Strategic Plan Update

(<http://www.longbeach.gov/civica/filebank/blobdload.asp?BlobID=4161>):

Long Beach has a projected \$103 million structural deficit for 2005-2007 after big spending reductions and revenue enhancements. For 2005 we still have a \$46 million budget gap after implementing austerity measures. The three-year financial plan involves the following Parks and Recreation-related cuts:

1. Reducing recreation spending for outside agencies
2. Decreasing funding for Long Beach Museum of Art and Public Corporation for the Arts
3. Reducing library hours
4. Restructuring the Municipal Band Season in 2006
5. A hiring freeze in the Parks and Rec Department
6. A spending curtailment policy
7. Suspending funding for mini-park development
8. Reducing recreation programs including suspending Mobile Skate Park Program
9. Suspending "Discover Long Beach Parks" program
10. Transferring extended day care to outside agencies
11. Restructuring day camps to supervised recreation model
12. Suspending Mobile Recreation Program in all non CDBG funded areas
13. Reducing support for Police Athletic League (PAL) programs in 2005 and eliminating funding for them altogether in 2006

Given the magnitude of these current cuts, other than the funds from the County bond that are earmarked for a sports park, how can the City Council justify increasing the City's debt or use discretionary city money for this BLD Sports Park project? 45

Section 4.13 Public Health Considerations

This section is inadequate because it doesn't address the public health considerations of relying on beer, cola drinks, and high-fat fast food for making the project profitable for BLD and consequently providing a revenue stream for the City. Our public health concerns about alcohol sales are the following:

- Alcohol abuse causes about 100,000 deaths in the United States each year
- Children are adversely affected by alcohol abusing parents
- Children in proximity with beer drinking adults may encourage alcohol experimentation and abuse
- Binge drinking is on the increase among college students
- When designated drivers are hard to find, inebriated patrons may drive from the park onto public streets, highways and freeways

We respectfully submit the following pictures for evidence, taken in January 2005, for your consideration: 47

We respectfully submit the following pictures for evidence, taken in January 2005, for your consideration: 48



Picture #3: Big League Dreams Sports Park restaurant/bar in Chino Hills (January 2005)

Our concerns about financing the BLD Sports Park with fast food sales are further exemplified by the evidence of the menu shown below:

48

		BEVERAGES			
PIZZA		KIDDY	1 0 0	PIZZA	
CHEESE SLICE	2 5 0	MEDIUM	2 2 5	CHEESE SLICE	2 5 0
PEPPERONI SLICE	2 7 5	LARGE	2 7 5	PEPPERONI SLICE	2 7 5
16" WHOLE CHEESE	15 0 0	BOTTLE WATER	2 0 0	16" WHOLE CHEESE	15 0 0
16" WHOLE PEPPERONI	16 0 0	SPORTS DRINK	3 0 0	16" WHOLE PEPPERONI	16 0 0
16" GRAND SLAM	17 0 0	COFFEE/HOT CHOCOLATE	2 0 0	16" GRAND SLAM	17 0 0
EXTRA TOPPINGS	1 5 0	SMALL ICEE	2 5 0	EXTRA TOPPINGS	1 5 0
		LARGE ICEE	3 7 5		
		BEER			
		LARGE DOMESTIC BEER	4 0 0		
		SMALL DOMESTIC BEER	2 7 5		
		ALL PRICES INCLUDE 7.75% SALES TAX			

Picture #4: Big League Dreams Sports Park Chino Hills Menu January 2005

Our health concerns include the following:

- The US Surgeon General Richard Carmona called the obesity epidemic America's number 1 public health problem. The EIR does not address the potential contribution of the BLD Sports Park to the obesity epidemic.
- The incidence of overweight and obese children and adults has more than doubled in the past 30 years (JAMA. 2002;288(14):1728-1732)
- Food marketing favors high fat, salt, sugar choices such as sold by BLD over healthy alternatives
- Junk food and soda significantly contribute to the obesity epidemic
 1. Supersize Me" – Morgan Spurlow gained 25 pounds on a McDonald's Fast Food Restaurant diet over 30 days
 2. Two or more fast food meals a week adds 10 pounds over 15 years (Lancet CARDIA Study January 2005)
 3. 97% of food and 85% of drinks sold in LBUSD vending machines is considered unhealthy by California Education Code standards. (California Center for Public Health Advocacy survey 1999-2001)
 4. Big League Dreams Sports Park depend on beer and junk food for profitability
 5. No food or drink, no matter how healthy, may be brought into their parks.

49

Based on the issues noted by this letter concerning wetlands preservation and restoration, recreation priorities in Long Beach, the prohibitive cost of a pay to play arrangement to most Long Beach residents from the underserved west, north and south of the City, the absence of discretionary City funds to pay for the project, and the serving of beer and junk food required for long-term profitability, we respectfully request that you reject the BLD Sports Park proposal.

50

While we do not suggest that no development be made, we are asking implicitly that the area receive sustainable development considerations as part of the process. Sustainable development is defined as "development that meets the needs of the present without compromising the ability of future generations to meet their own needs".

51

We believe that Willow Springs is an important part of our Long Beach history. Indeed, on a map it looks like the beating heart of the City, and historically, it has been. It gave Long Beach life and sustenance for many decades. Therefore, we are asking for historical, economic, environmental, recreational and food justice on behalf of the community of Long Beach as a whole. Respectfully submitted, we remain

52

Sincerely yours,



David K. Cundiff, MD – President, on behalf of
Long Beach Organic Board of Directors
Long Beach, California

DKC:jme

LONG BEACH ORGANIC

O-4-1

The comment is introductory and does not contain any substantive statements or questions about the Draft EIR, and no further response is necessary. However, it should be noted that the project is incorrectly named in the comment. The project name is Long Beach Sports Park. Big League Dreams is not the project applicant. The Proposed Project is a proposed municipal project. Big League Dreams, one of several companies that operate similar facilities, was consulted during the master planning process; however, the City has not selected a contract/operator for the proposed Sports Park

O-4-2

The comment summarizes project impacts and proposed mitigation for impacts to wetlands. This comment does not contain any substantive statements or questions about the Draft EIR, and no further response is necessary.

O-4-3

The comment states that the wetlands on site are underestimated. This comment does not specifically address the criteria for delineation of wetlands pursuant to agency criteria. Obligate wetland species are those in a particular group of hydrophytic vegetation that almost always occur in wetlands, which may be regulated by State and/or federal agencies. Hydrophytic species are those included on the *National List of Plant Species that Occur in Wetlands* (Reed 1998). The entire suite of hydrophytic plants is used to determine whether a particular area may be a wetland. However, in order for an area to be considered, it must be *dominated* by hydrophytic vegetation. Under federal wetland criteria, the area must also have wetland hydrology and hydric soils. Areas of dominant obligate hydrophytes are limited to the wetlands identified in the Draft EIR. Mulefat is a facultative wetland hydrophytic plant species that occurs in wetlands most of the time. However, in addition to its occurrence in identified wetlands on site, this species also occurs in scattered non-wetland portions of the site (i.e., those areas that do not demonstrate wetland hydrology or soils). Please see the Regulatory Background section of the *Delineation of Wetlands and Jurisdictional Waters* report in Appendix E, Volume II, of this Draft EIR for more information, including a definition of the five types of hydrophytic vegetation, including wetland indicator status species.

Wetlands on site were characterized in accordance with regulatory requirements. A routine wetland delineation was conducted, and areas of potential jurisdiction were evaluated according to the Corps 1987 Manual (i.e., Environmental Laboratory 1987) and California Department of Fish and Game (CDFG) guidelines. The project site was surveyed on foot for both potential wetlands and nonwetland jurisdictional waters, as well as streambed and riparian resources. Portions of the project site that contained potentially jurisdictional waters included the retention basin and associated drainage near the middle of the project site, as well as three ponding areas scattered throughout the site. One ponding area was located in the northern end of the site, another in the southwestern portion of the site, and a third in the western portion of the site. Measurements of jurisdictional areas were taken in the field and mapped on a topographic base (scale: 3/4 inch = 50 feet). The jurisdictional area for the

project was calculated using Geographic Information Systems (GIS) software and by multiplying the average width of the drainage by the length. Please see Figures 4.5.1 and 4.5.3 in the Draft EIR.

All areas within the project site supporting species of plant life potentially indicative of wetlands were evaluated according to routine wetland delineation procedures described in the 1987 Manual. Standard data forms were completed for each sample plot; transcriptions of these data forms are included in Attachment B of this report. At each sample plot, the dominant and subdominant plant species were identified, and their wetland indicator (Reed 1988) status was noted. Soil characteristics were assessed by digging a soil pit and examining the various profiles to determine the presence or absence of hydric indicators. Finally, hydrologic conditions, including any surface inundation, saturated soils, groundwater levels, and/or other wetland hydrology indicators were noted. All water bodies were examined for evidence of an OHWM, which defines the lateral limit of the Corps jurisdictional boundaries unless adjacent wetlands are determined to be present.

Based on this methodology, it was determined that there are 0.08 acre of wetlands characterized by cattail marsh in the channel and 0.41 acre of wetlands in the detention basin. The commentor's assertion that there are 15 acres of wetlands or wetlands species on site is incorrect. Areas must be dominated by wetland species to even be considered as potential wetlands. The occurrence of "scattered wetland plants" does not constitute wetlands for either CEQA purposes or compliance with State and federal wetlands regulations.

O-4-4

This comment requests that another survey be completed to make a "new true value assessment of the area of wetlands habitat" on site in light of recent precipitation. Pursuant to State CEQA Guidelines Section 15125, "an EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the Notice of Preparation is published . . . This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant." Furthermore, the severe storms referred to in the comment are an anomaly in southern California. As such, an additional wetlands delineation based on the possibility that an abnormally heavy rainfall may have expanded on-site wetlands is not appropriate or required under CEQA. Please refer to Response to Comment O-4-3.

O-4-5

This comment appears to object to off-site mitigation because of the difficulty associated with creating wetlands and supports wetlands restoration instead. Given the extensive grading that is required to render the site developable and to implement the project, wetlands restoration in the current location (as part of an ill-maintained County detention basin) is not practical. In addition, there are a number of benefits to implementing wetlands mitigation off site. For example, the project site is isolated from other wetlands areas. The mitigation site is located along the San Gabriel River and will be part of a larger conservation area. Resource agencies typically prefer that mitigation areas be contiguous with other habitat areas and associated with wildlife movement opportunities. In addition, wetland mitigation sites should be associated with a natural or passive water supply such as an adjacent river, stream, lake, marsh, etc. Therefore, the proposed off-site wetlands mitigation is both appropriate and viable.

O-4-6

This comment states that nationally, many compensatory wetlands mitigation project have poor compliance with regulatory agency requirements and often fail. The City is required to comply with the wetlands mitigation described above and as approved by the appropriate resource agencies, including on-going monitoring and maintenance. In the past, some mitigation sites have indeed failed due to a lack of proper design, maintenance, and/or monitoring. In recent years, mitigation requirements have become more stringent, and enforcement of this requirement is at a very high level.

The mitigation measures included in the Draft EIR are feasible to implement, as required by Section 15126.4 of the CEQA Guidelines, which states “An EIR shall describe feasible measures which could minimize significant adverse impacts.” Implementation of mitigation measures is required by CEQA. For example, CEQA Guidelines Section 15097 requires that the public agency shall adopt a program for monitoring or reporting on the mitigation measures specifically for the purpose of ensuring that the migration measures identified in the Draft EIR are implemented.

Prior to issuance of grading permits for the Proposed Project, the City must obtain authorization from the appropriate resource agencies (CDFG, Corps, and RWQCB) as specified in Mitigation Measure 4.5.3. These agencies may impose additional requirements of the wetlands mitigation site to ensure long-term viability of the wetlands. The City will be required to comply with the requirements of resource agency permits. Prior to issuance of certificates of occupancy, the City shall develop off-site wetlands mitigation as specified in Mitigation Measure 4.5.4. Mitigation Measure 4.5.4 further specifies that the City shall be responsible for both construction and on-going maintenance.

O-4-7

The comment is a quote from the Long Beach General Plan Open Space and Recreation Element that supports the preservation of coastal and riparian ecosystems, including wetlands. The Proposed Project site is not characterized by coastal and riparian ecosystems. Instead, the project site is characterized by common and ornamental species, with 0.08 acre of wetlands (cattail marsh) in the drainage channel and 0.41 acre of wetlands in the detention basin. The impacts to sensitive riparian and wetlands resources are appropriately analyzed in the Draft EIR (Section 4.5 and supporting documentation in the Draft EIR Appendices) and are restated below in summary format for the reader's information.

The loss of disturbed (mostly nonnative) habitat and the associated reduction of locally common wildlife populations are not considered significant impacts because they do not substantially affect listed or candidate species, riparian habitat, or other sensitive natural community, federally protected wetlands or wildlife movement. The loss of open water and associated cattail marsh is considered less than significant due to the small size and isolation of the habitats. Grading of the project will result in filling of 0.08 acre of riparian habitat in a concrete drainage course and 0.41 acre within the associated retention basin, both of which are subject to Corps of Engineers and California Department of Fish and Game jurisdiction. In addition, virtually all streambeds and associated plant communities are considered sensitive biological resources and are regulated by agencies, as described in the Regulatory Setting section. Therefore, impacts to these areas require mitigation.

The Draft EIR includes mitigation measures, specifically Mitigation Measures 4.5.3–4.5.5, to address these impacts. Project impacts to riparian and wetlands resources are mitigated to below a level of significance, including the development of off-site mitigation for wetlands along the San Gabriel

River. Therefore, the Proposed Project is not in conflict with the goals of the City's Open Space and Recreation Element, as cited by the commentor.

O-4-8

This comment states that the project site is in a 100-year floodplain and as such cannot be sold, leased, or rented to a for-profit entity for commercial purposes. The comment does not cite specific federal regulations, and since specific facts are not included in the comment, no further response to the alleged regulatory requirements can be provided. It is noted, however, as stated on page 4.4-16 of the Draft EIR, the project site is not within a mapped 100-year flood hazard area (Flood Insurance Rate Map No. 0601360010C, July 6, 1998).

O-4-9

This comment suggests that restoration of the wetlands on site would provide flood control benefits. As specified in Section 4.4 of the Draft EIR and Appendix C, Hydrology Study, the Proposed Project drainage plan has been designed to be in full compliance with the requirements of the County of Los Angeles Department of Public Works. Potential hydrology impacts of the Proposed Project are below a level of significance. Please refer also to Response to Comment O-4-8. The opinion will be made available to decision-makers for their consideration as part of their determination regarding the Proposed Project. The comment does not contain any substantive statements or questions about the Draft EIR or the analysis therein; therefore, no further response is necessary.

O-4-10

This comment suggests that restoring the wetlands would provide water quality benefits. As specified in Section 4.4 of the Draft EIR and Appendix C, Hydrology Study, the Proposed Project will incorporate Best Management Practices (BMPs) to ensure that water quality and storm water runoff meets (or exceeds) regulatory requirements. Potential water quality impacts of the Proposed Project are below a level of significance with mitigation. The opinion will be made available to decision-makers for their consideration as part of their determination regarding the Proposed Project. The comment does not contain any substantive statements or questions about the Draft EIR or the analysis therein; therefore, no further response is necessary.

O-4-11

The comment states that restored wetlands would provide educational and recreational amenities to residents and children of Long Beach. It should be noted that regulatory agencies typically do not allow recreational use of wetlands. The opinion will be made available to decision-makers for their consideration as part of their determination regarding the Proposed Project. The Proposed Project mitigation will contribute to a larger conservation area along the San Gabriel River that could be considered to have educational benefits.

O-4-12

This comment provides a summary of information found in the City Park, Recreation and Marine Strategic Plan (2003) and the City General Plan Open Space Element (2002) regarding recreation needs in the City. The comment does not contain any substantive statements or questions about the Draft EIR or the analysis therein; therefore, no further response is necessary.

O-4-13

The comment states that 359 acres of recreation open space on LBUSD property is available to the public after school and on weekends. The comment includes information from two different planning documents to imply that the Department of Parks, Recreation, and Marine Strategic Plan (“Departmental Strategic Plan”) did not consider the school recreation facilities described in the City’s Open Space and Recreation Element. Page 23 of the Departmental Strategic Plan states that “Recreation facilities at schools, that are accessible to the public, have been included in the analysis of service levels and needs, recreational facilities at schools where no public access is allowed, are not included.” Therefore, the Departmental Strategic Plan does not overestimate the need for additional recreation facilities in the City.

O-4-14

The comment states that no survey documents the need for an additional 27 baseball/softball fields and 55 soccer/football fields. As stated in Section 4.10 of the Draft EIR, the City, Department of Parks, Recreation, and Marine Strategic Plan identified an existing shortfall in the number of sports fields in the City. For example, currently there is one soccer/football field for every 10,989 residents, which is below the target service level of one soccer or football field for every 5,000 residents.¹ Long Beach currently has a total of 65 publicly accessible sports fields that can be used for baseball or softball, or one baseball/softball field for every 7,100 residents.² This level is also below the target service level of one baseball/softball field for every 5,000 residents. The Department of Parks, Recreation, and Marine Strategic Plan concludes that there is a current need for 27 additional baseball/softball fields in the City, and that the need will grow to 32 fields by 2010. The Departmental Strategic Plan also identifies a current need for an additional 50 soccer/football fields and projects that the need will grow to 55 fields by 2010.

O-4-15

This comment opines that the need for community gardens as active recreation is acute. The opinion will be made available to decision-makers for their consideration as part of their determination regarding the Proposed Project. The comment does not contain any substantive statements or questions about the Draft EIR or the analysis therein; therefore, no further response is necessary.

O-4-16

This comment re-states the opinion that community gardening opportunities are deficient in Long Beach. The opinion will be made available to decision-makers for their consideration as part of their determination regarding the Proposed Project. The comment does not contain any substantive statements or questions about the Draft EIR or the analysis therein; therefore, no further response is necessary.

O-4-17

This comment provides a quote from the Draft EIR regarding the anticipated Sports Park contract operation. The comment does not contain any substantive statements or questions about the Draft EIR or the analysis therein; therefore, no further response is necessary.

¹ Long Beach, Department of Parks, Recreation and Marine Strategic Plan (2003), p. 35.

² Ibid.

O-4-18

Costs related to implementation and operation of the Proposed Project are not germane to the subject environmental analysis. Effects analyzed under CEQA must be related to a physical change in the environment pursuant to Section 15358(b) of the State CEQA Guidelines. Section 15131(a) of the State CEQA Guidelines further specifies that economic and social effects of a project that do not result in impacts to the physical environment shall not be treated as significant effects on the environment. No further response to comments regarding costs are warranted.

O-4-19

This comment states that low-income residents from Long Beach will not be able to afford to use the proposed Sports Park. The pricing structure for the proposed facility has not yet been established. Therefore, it is premature to address this issue. The opinion will be made available to decision-makers for their consideration as part of their determination regarding the Proposed Project. The comment does not contain any substantive statements or questions about the Draft EIR or the analysis therein and does not address an environmental issue; therefore, no further response is necessary. Also see response O-4-18.

O-4-20

This comment states that the Proposed Project is inconsistent with the Long Beach Park Recreation and Marine Strategic Plan priority to increase recreation in currently underserved areas of the City. The comment is incorrect because not only is the Proposed Project located in an area of the City (west-central portion of the City) that is underserved with recreation facilities as described in the City Department of Park, Recreation, and Marine Strategic Plan, the Proposed Project is intended to attract league sports away from local and community parks to make public parks throughout the City more available to use by local residents. Since the comment does not raise any environmental issues, no further response is required by CEQA.

The opinion will be made available to decision-makers for their consideration as part of their determination regarding the Proposed Project.

O-4-21

The comment pertains to the success of other public-private partnerships outside the City. It is unclear from the comment to which public-private partnerships the commentor is referring. Because there are no facts or analysis provided in the comment and no environmental issue is raised, no further response is necessary. This comment will be made available for consideration by the decision-makers. The comment does not contain any substantive statements or questions about the Draft EIR or the analysis therein, and no further response is necessary.

O-4-22

This comment expresses the opinion that “golf, with rare exception, is for rich kids.” The City disagrees with the opinion, and is committed to making all kinds of recreation activity available to all segments of the City’s population. As stated in the Draft EIR, it is anticipated that the youth golf center would be operated by a separate private or nonprofit operator or by the City. The intent of the Youth Golf Facility is to provide training in basic golf skills to young people who might not otherwise have the exposure and opportunity to play golf. The Youth Golf Facility will be combined with a development center that provides academic support through after-school programs and resources. Since no environmental issue is raised in the comment, no further response is warranted.

O-4-23

Effects analyzed under CEQA must be related to a physical change in the environment pursuant to Section 15358(b) of the State CEQA Guidelines. Section 15131(a) of the State CEQA Guidelines further specifies that economic and social effects of a project shall not be treated as significant effects on the environment. As such, an economic analysis of the Youth Golf Facility is not required for environmental review under CEQA.

O-4-24

Please refer to Responses to Comments O-4-22 and O-4-23.

O-4-25

Please refer to Response to Comment O-4-22. The purpose of the Youth Golf Facility is to provide youth golf training opportunities and a development center that provides academic support through after-school programs and resources.

O-4-26

Costs related to implementation and operation of the Proposed Project are not germane to the subject environmental analysis. Effects analyzed under CEQA must be related to a physical change in the environment pursuant to Section 15358(b) of the State CEQA Guidelines. Section 15131(a) of the State CEQA Guidelines further specifies that economic and social effects of a project shall not be treated as significant effects on the environment. As such, an economic analysis of the Youth Golf Facility is not required for environmental review under CEQA. This comment represents the opinion of the commentor on matters not specific to the environmental information and analysis in the Draft EIR. This opinion will be made available for consideration by the decision-makers as part of their determination regarding the Proposed Project.

O-4-27

This comment states that the City should not subsidize the construction and operation of the Proposed Project in lieu of existing recreation programs. It is not the City's intent to divert funding from existing recreation programs to fund the proposed Youth Golf Facility. Please refer to Responses to Comments O-4-22 and O-4-23.

O-4-28

This comment provides a quote from State CEQA Guidelines Section 15126.6 (f)(1) regarding a reasonable range of feasible alternatives. The comment does not contain any substantive statements or questions about the Draft EIR or the analysis therein; therefore, no further response is necessary.

O-4-29

This comment requests information regarding the initial and ongoing costs of the Proposed Project relative to other potential recreation projects and suggests that this information is required by CEQA. CEQA requires analysis of a reasonable range of feasible alternatives to the Proposed Project, not a comparison of the Proposed Project to other unrelated recreation projects within the City. Please also refer to Response to Comment O-4-26.

O-4-30

Please refer to Response to Comment O-4-26.

O-4-31

Please refer to Response to Comment O-4-26.

O-4-32

Please refer to Response to Comment O-4-26. Property transfer negotiations are conducted separately from the Draft EIR process. The City is responsible for the implementation of project mitigation measures.

O-4-33

Please refer to Response to Comment O-4-26.

O-4-34

Please refer to Response to Comment O-4-26.

O-4-35

Please refer to Response to Comment O-4-26.

O-4-36

Please refer to Response to Comment O-4-26.

O-4-37

This comment provides a composite of information from the Draft EIR. The comment does not contain any substantive statements or questions about the Draft EIR or the analysis therein; therefore, no further response is necessary.

O-4-38

Please refer to Response to Comment O-4-26. The City is the project proponent of an operationally self-sufficient project, including a Sports Park and other uses. The Draft EIR notes where City staff is unaware of substantial sources of funding for the acquisition, construction, and/or operation of a specific alternative use of the project site. An alternative use of the site for which a financing mechanism is not known for acquisition, construction, and/or operation may be considered infeasible. CEQA Guidelines Section 15126.6(a) notes that "An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives." CEQA Guidelines Section 15126.6(c) further states that "Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts." The alternative use of the site cited in the comment, a cultural/nature park, is not only considered infeasible, but would fail to meet the primary recreation objectives of the project as described in Section 5.4 of the Draft EIR.

O-4-39

Please refer to Response to Comment O-4-1. Big League Dreams is not the project applicant. The Proposed Project is a proposed municipal project. The City's intent is to acquire and retain ownership

of the assembled project site. Contract operators may be used to manage the facilities. The City is currently in the process of identifying a wide range of potential funding sources. Please see Response to Comment O-4-26.

O-4-40

This comment expresses an opinion that the best use of the property should be determined by informed collaboration of stakeholders throughout the City. Land use planning for the project site has been a topic in the public forum for a number of years. Previously considered uses for the project site included an auto mall in 1988, a retail center in 1991, a warehouse/storage facility in 1994, and an auto racetrack in 1996. Political controversy and community objection to the previously recommended Sports Park site in the northwest corner of Area III of El Dorado Regional Park resulted in the City Council's direction in 1997 to consider and evaluate the current project site, at the corner of Spring Street and California Avenue, for a sports complex. The City's intention to consider the project site for a Sports Park use has been public for the past eight years. A public scoping meeting for the project Draft EIR was conducted in February 2004. The City's Recreation Commission also discussed this project on February 17, 2005, and the Recreation Commission's Capital Improvement Projects subcommittee held a public study session on June 15, 2005.

The opinion will be made available to decision-makers for their consideration as part of their determination regarding the Proposed Project. The comment does not contain any substantive statements or questions about the Draft EIR or the analysis therein; therefore, no further response is necessary.

O-4-41

This comment provides several alternative uses and suggests that six uses identified in the comment could be accommodated on the Proposed Project site, including wetlands restoration and community gardens. The opinion will be made available to decision-makers for their consideration as part of their determination regarding the Proposed Project. The comment does not contain any substantive statements or questions about the Draft EIR or the analysis therein; therefore, no further response is necessary.

O-4-42

Please refer to Response to Comment O-4-26.

O-4-43

Please refer to Response to Comment O-4-26.

O-4-44

Please refer to Response to Comment O-4-26.

O-4-45

Please refer to Response to Comment O-4-26.

O-4-46

Please refer to Response to Comment O-4-26.

O-4-47

Please refer to Response to Comment O-4-1. This comment suggests that the type of food to be sold at the Sports Park should have been considered in the Public Health and Safety section of the Draft EIR. The comment letter further opposes the sale of alcohol at the proposed Sports Park because of the health risks associated with alcohol abuse. Effects analyzed under CEQA must be related to a physical change in the environment pursuant to Section 15358(b) of the State CEQA Guidelines. The concession menu is not an appropriate Draft EIR topic as defined by CEQA (see CEQA Checklist, Appendix G, for typical CEQA considerations). This comment will be made available for consideration by the decision-makers.

O-4-48

This comment provides pictures of menus at Big League Dreams parks outside of the City and questions whether fast food sales should be allowed on the project site. Please refer to Responses to Comments O-4-1, O-4-26, and O-4-47.

O-4-49

This comment provides information about obesity and food marketing/food sales at Big League Dreams Parks outside of the City. Please refer to Responses to Comments O-4-1, O-4-26, and O-4-47. This comment will be made available for consideration by the decision-makers. The comment does not contain any substantive statements or questions about the Draft EIR or the analysis therein; therefore, no further response is necessary.

O-4-50

This comment provides a summary of comments provided in O-4-1 through O-4-49. All comments provided will be made available for consideration by the decision-makers. See responses to comments above.

O-4-51

This comment requests that sustainable development considerations be used to develop the project site in lieu of the proposed Sports Park. The comment does not provide specific information or facts regarding the application of sustainable development principles to the Proposed Project or project site. The Draft EIR considers the application of design approaches that are considered consistent with “sustainable development” principles. For example, it is the policy of the City to plan, design, construct, manage, renovate, and maintain its facilities and buildings in a sustainable manner. The U.S. Green Building Council’s Leadership in Energy and Environmental Design (LEED) Rating System and Reference Guide is used to determine what constitutes sustainable building under this policy. During the design phase for the Proposed Project, the City will incorporate LEED green building principles and practices into the planning, design, construction, and management of the Proposed Project facilities. Project compliance with Title 24 standards and incorporation of green building strategies will further reduce any potential impacts on energy resources. In addition, Mitigation Measures 4.7.2 and 4.7.3 address recycling requirements of the Proposed Project. Therefore, the Proposed Project incorporated approaches that are considered consistent with “sustainable development” principles.

This comment will be made available for consideration by the decision-makers. The comment does not contain any substantive statements or questions about the Draft EIR or the analysis therein; therefore, no further response is necessary.

O-4-52

This comment expresses an opinion about the value of “Willow Springs” and summarizes the main points of Responses to Comments O-4-1 through O-4-29. See responses to comments.